

## General Questions for 214 Applicants with Foreign Ownership

1. What services does Applicant provide? Include services subject to this application or otherwise (e.g. "information services"?)

International call termination services provided to U.S. and international carriers (U.S. origination to international destinations and international origination to U.S. destinations)

2. What other services does Applicant expect to provide if the application is granted?

None at this time.

3. How are such services provided from a technical standpoint (in general)?

Resale of international call termination services provided to U.S. and international carriers utilizing Session Border Controllers (SBC), Routers, and VoIP gateways.

4. What facilities or equipment does Applicant control (own/lease/otherwise control) in the U.S.?

Telco Digital controls Session Border Controllers, Routers, and VoIP gateways.

5. What facilities or equipment does Applicant control (own/lease/otherwise control) outside of the U.S. that have any involvement in the routing/switching/transmission of communications originating or terminating in the U.S.?

None at this time.

6. What services, facilities or equipment does Applicant control that afford direct access by a customer or subscriber of Applicant to the PSTN? To the Internet? (e.g. Is applicant more in the nature of a "local exchange carrier" or an "interexchange carrier? Is applicant a "facilities based" provider or a "mere reseller"?)

Telco Digital is a "mere reseller."

7. Can Applicant enable within the U.S. the real-time interception by U.S. law enforcement authorities of communications sent or received via services provided by Applicant? Explain.

Yes. By the use of Lawful Intercept/CALEA module embedded into the platform.

8. Can Applicant enable within the U.S. the real-time interception by U.S. law enforcement authorities of call data (separated from communications) pertaining to communications sent or received via services provided by Applicant? Explain.

Yes.

9. Has applicant been requested by U.S. law enforcement authorities to perform either of actions described in above? What was the result?

No.

10. Does applicant maintain call detail records? If so, where and how, and for how long are they maintained? Has applicant been requested by U.S. law enforcement authorities to produce call detail records? What was the result?

Telco Digital maintains call detail records as flat files in Telco Digital U.S. facilities within a secure network for 2 years.

No. Telco Digital has not been requested by U.S. law enforcement authorities to produce call detail records.

11. What is the nature/involvement of foreign (non-U.S.) individuals, governments or entities in the day to day business? In overall corporate policy decisions? In any of the law enforcement activities listed above?

Nedim Mitrani (Turkish Resident)

12. How will the nature/involvement of foreign (non-U.S.) individuals, governments or entities in any of the above change as result of this transaction?

No change anticipated.

13. What personnel does applicant maintain in the U.S.?

Applicant maintains a relationship with Charles H. Helein of The Helein Law Group, LLP, who will temporarily act as its U.S. agent and U.S. point of contact in Telco Digital's main business office until such time as Telco Digital leases space and hires U.S. based employees. Applicant anticipate utilizing the Helein Law Group as its U.S. agent for the first six (6) months of operations.

14. What personnel have access (authorized or unauthorized) to communications originating or terminating within the U.S.? to call data regarding such communications? To call detail records regarding such communications? To information regarding any interception or request for such information by U.S. law enforcement authorities?

Charles H. Helein.

15. What personnel have involvement in actually implementing Applicant's response to requests for assistance by U.S. law enforcement authorities?

Nedim Mitrani and Charles H. Helein.

16. How will applicant ensure the maintenance of a 24/7 point of contact within the U.S. for law enforcement purposes?

Applicant's 24/7 point of contact within the U.S. for law enforcement purposes is Applicant's legal counsel:

Charles H. Helein  
The Helein Law Group, LLP  
8180 Greensboro Drive, Suite 700  
McLean, VA 22102  
Tel: 703-714-1300  
Fax: 703-714-1330  
E-mail: [mail@thlglaw.com](mailto:mail@thlglaw.com)

17. What steps does Applicant take in order to screen personnel involved in any of the above?

Applicant has no immediate plans to add personnel. However, background checks shall be initiated should additional personnel be necessary.

18. Will applicant provide background information for a security check related to any appropriate individuals or entities listed in response to above questions?

Yes.